



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

OCT 18 1985

ACTION MEMORANDUM

TXD065103327

SUBJECT: Immediate Removal Request, Bath Electrical Systems, Inc.,  
Clute, Brazoria County, Texas

FROM: Mary Ellen Crowley, On-Scene Coordinator *MEC*  
Field Response Section (6ES-EF)

TO: Dick Whittington, P.E. *Dick*  
Regional Administrator

THRU: Russell F. Rhoades, Director *RFR*  
Environmental Services Division (6ES)

PURPOSE:

This immediate removal action is proposed for the Bath Electrical Systems facility, Clute, Brazoria County, Texas. This proposed action includes vacuuming contaminated liquid, excavating contaminated soil and concrete, and disposing contaminated material at an approved PCB disposal facility. The estimated cost of this action is \$750,000.

BACKGROUND:

The morning of 9/18/85, Tom Soderman, president of Bath Electrical Systems Inc., (BES) discovered that four - 1,000 gallon tanks containing oil with documented PCB levels up to 78,000 ppm had been opened and had drained off BES property into a drainage ditch along the State highway right-of-way. Approximately 3,500 gallons of PCB oil were released into this ditch that drains into a nearby bayou. The oil contaminated 650 feet of the ditch, 19,000 gallons of water in the ditch and 3,000 square feet of BES property. BES is one of several small businesses along the west side of Texas Highway 288. An access road borders the south side of the facility and a residential area lies on the west side directly behind BES. Residents in the area use private wells as their water source.

In the ditch areas not affected by PCB contamination, there is abundant aquatic and plant life. The drainage ditch continues along the highway right-of-way until it reaches Bayou Bastrop. Much aquatic, plant and bird life populate the bayou. Many residents live along the bayou's banks.

The ditch is readily accessible to the public and is attractive to children as a play area. The site clearly requires an immediate removal action due to the imminent threat of public and environmental contact with high levels of PCB's.

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### THREAT:

The threat at this site is to the health of the public and the environment by direct contact with oil containing polychlorinated biphenyls (PCB's).

Polychlorinated biphenyls are a group of chemicals which have been demonstrated to cause cancer in animals and are suspected human carcinogens. PCB's are toxic via dermal and oral routes. PCB's can cause liver damage, skin discoloration and chloracne. PCB's are known to bioaccumulate in human and animal tissue. PCB's are very stable and persist in the environment, thus necessitating the need to take action.

### ENFORCEMENT:

1. Mr. Tom Soderman is president of Bath Electrical Systems, Inc. Principle owners are: Tom Soderman; Dennis Janak; Evelyn Arnt; John Burch; Bobby Fielden. The BES property is leased from the Texas general partnership of Stanley, Moss, and Stanley.
2. Mr. Tom Soderman notified EPA of the 3,500 gallon PCB spill the afternoon of 9/18/85.
3. Due to the time element, a verbal demand was issued to Bath Electrical Systems to conduct an immediate removal of the spill.
4. The site is not on the NPL and will not be listed.

### PROPOSED PROJECT AND COST:

The proposed action includes vacuuming the PCB contaminated liquid from the ditch, solidifying the remaining material, excavating the solidified material and the spill area on the BES property and removing all PCB contaminated material to an approved PCB disposal facility. Further excavation would continue as required pending sample results from excavated areas. The estimated total project cost is \$750,000. The cost is estimated based on a Rollins Environmental Services estimate given to BES.

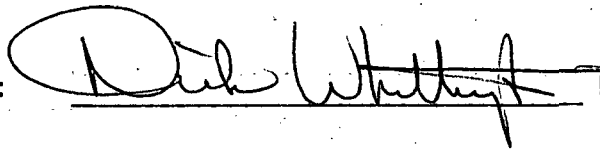
ERCS	\$720,000
TAT	20,000
EPA	10,000
 TOTAL Project Ceiling	 \$750,000

The period of performance is estimated to be 8 days of work onsite and 2 days to allow for transportation and disposal for a total of 10 days.

REGIONAL RECOMMENDATION:

An immediate removal action is recommended at the BES spill site as conditions at the site meet the NCP Section 300.65 criteria for an immediate removal. The estimated total project cost is \$750,000 of which \$720,000 is for extramural cleanup contractor cost. You may indicate your approval or disapproval by signing below.

APPROVED:



DATE:

Oct 18, 1985

DISAPPROVED:

\_\_\_\_\_

DATE:

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NOTE:

This immediate removal action was given verbal approval by Fran Phillips on September 20, 1985. Bath Electrical Systems (BES) was then issued a verbal demand to conduct the immediate removal action to the EPA's satisfaction pending EPA takeover. BES successfully assumed responsibility within the time schedule in the demand. This action memorandum documents the approved immediate removal action. The project cost ceiling is based on an estimate from the BES contractors.